

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA

In Re:)	
)	Case No. 22-00744
Property Holders, LTD,)	Chapter 11 Subchapter V
)	
)	CHAPTER 11 SUB V TRUSTEE'S
)	MOTION TO COMPEL
)	
Debtor and Debtor-in-Possession.)	
)	

Douglas D. Flugum Chapter 11 Subchapter V Trustee, hereby moves for the Court to Compel Debtor to:

1. Immediately pay the fees approved by court order "Order Granting Application For Compensation (Related Doc # 240) Granting for Douglas Dean Flugum, fees awarded: \$4275.00, expenses awarded: \$0.00 Ordered on 2/10/2025. (tsta) (Entered: 02/10/2025)" (Doc. # 245).
2. Immediately pay open account balance from previous court awarded fees (see account statement).
3. Deposit \$500 per month in the Debtor's lawyer's trust account for payment of Subchapter V Trustee fees approved by the court (max amount \$5000 held in trust for this purpose).
4. Replenish the trust account at \$500 per month when funds are removed by payment of court approved Subchapter V Trustee fees.

In support, the Subchapter V Trustee states as follows:

1. On November 21, 2022, Douglas D. Flugum was appointed Subchapter V Trustee (Doc # 4).
2. The court has approved 5 interim applications for fees.
3. Payment of 2nd Interim Application fees took 6 months for payment of the invoice.
4. Payment of 3rd Interim Application fees took over 2 months for payment of the invoice.
5. Payment of 4th Interim Application fees took 10 months for payment of the invoice.
6. The 5th Interim Application for fees has had no payments in over 2 months.
7. The Subchapter V Trustee continues to ask for payment from debtor through emails and calls with debtor and his lawyer.
8. Debtor and his lawyer selected the Subchapter V bankruptcy designation and knew there would be fees associated with the filing. Debtor should be prepared to pay the fees on a timely basis.
9. The Subchapter V Trustee is funded by the debtor but is not beholding to the debtor. The Subchapter V trustee reports to the court for the good of the whole.
10. The Subchapter V Trustee's fees should not be held hostage by the debtor. If this is allowed, it could lead to reports and actions that could be biased to the debtor. This could happen because to get paid, the Trustee would need to please the debtor.

WHEREFORE, Douglas D. Flugum respectfully requests this Court enter an order compelling Debtor to:

1. Immediately pay open account balance from court awarded fees (see account statement).
2. Deposit \$500 per month in the Debtor's lawyer's trust account for payment of Subchapter V Trustee fees approved by the court (max amount \$5000 held in trust for this purpose).
3. Replenish the trust account at \$500 per month when funds are removed by payment of court approved Subchapter V Trustee fees.

Dated: April 20, 2025

/s/ Douglas D. Flugum

Douglas D. Flugum
Bugeye Ventures, Inc.
PO Box 308
Cedar Rapids, IA 52406
Phone: 319-389-4581
Email: dflugum@bugeyeventures.com
Subchapter V Trustee

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 20th day of April, 2025, a copy of the foregoing document was filed with the Clerk of Court for the United States Bankruptcy Court for the Northern District of Iowa using the CM/ECF system, and served electronically on those participants that receive service through the CM/ECF System.

/s/ Douglas D. Flugum

Date
4/1/2025

Property Holders, LTD
Charles A. Davisson
PO Box 2328
Cedar Rapids, IA 52406

				Amount Due	Amount Enc.
				\$4,325.00	
Date	Transaction			Amount	Balance
12/31/2021	Balance forward				0.00
02/21/2023	INV #12401. Due 02/21/2023.			4,375.00	4,375.00
03/25/2023	PMT #1035.			-4,375.00	0.00
06/11/2023	INV #12402. Due 06/11/2023.			5,170.82	5,170.82
10/05/2023	INV #12404. Due 10/05/2023. Third Interim Application			4,562.50	9,733.32
12/10/2023	PMT #15039764.			-9,733.32	0.00
04/03/2024	INV #12406. Due 04/03/2024.			4,750.00	4,750.00
07/19/2024	PMT			-1,000.00	3,750.00
09/27/2024	PMT #2255.			-1,000.00	2,750.00
10/24/2024	PMT #1234.			-1,000.00	1,750.00
12/13/2024	PMT #2174.			-700.00	1,050.00
01/20/2025	INV #12413. Due 01/20/2025.			4,275.00	5,325.00
02/25/2025	PMT #99.			-1,000.00	4,325.00
CURRENT		1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE
0.00		0.00	0.00	4,275.00	50.00
					\$4,325.00